

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

TOMAS MIKO,

*Plaintiff,*

v.

REPRESENTATIVE VERNON JONES,  
in his individual and official capacities,  
*Defendant.*

CIVIL ACTION FILE  
NO. 1-20-cv-02147-SDG

**DECLARATION OF DOYLE POPE**

NOW COMES DOYLE POPE, and, after being duly sworn, herein states and declares under penalty of perjury the following:

1. I give this declaration based upon my own personal knowledge.
2. I am an adult citizen of the United States. I am competent to testify as set out herein.
3. I am a private investigator working with Black Spear Intelligence. I have extensive military intelligence training and have been trained as an intelligence collector by the U.S Army. I meet all the requirements to serve formal summons in Georgia.
4. I was first contacted about completing formal service of process on the Defendant of the Complaint and Motion for Preliminary Injunction by my supervisor Mr. Robert Thomas. Once our firm was retained by Mr. Miko, I initiated working to complete service on Defendant Jones.
5. Working with Mr. Thomas, we prepared to serve Mr. Jones by tracing the residence of Defendant through public records to multiple locations (perhaps residences)

where Defendant Jones regularly frequents. We also located places that Defendant would be openly available to receive service documents.

6. Further, in preparation for service of the records, I studied the physical characteristics of Mr. Jones so that I would be able to recognize him to complete service.

7. I researched Mr. Jones' background and numerous pictures of him from the internet where several differing images of Mr. Jones are displayed. As a public figure, with extensive video footage available, Mr. Jones' is easily recognizable.

8. I also studied videos of Mr. Jones, as he regularly appears on television. I reviewed and committed to memory Mr. Jones' appearance so I could recognize him in public and listened carefully to his voice so I could identify his speech.

9. I also tracked Mr. Jones' public activities through his multiple social media accounts. Along with several pictures of Mr. Jones on these platforms, Mr. Jones also posted several comments about his daily activities, his locations, and his future plans.

10. On November 28, 2020, I initiated surveillance of Mr. Jones at a home listed as his residence in public records. Mr. Jones departed his home and traveled to a shopping center. When he exited the car, I walked up to him and stated, "Mr. Jones, how are you today sir?" Mr. Jones acknowledged my greeting and responded in a voice I recognized as Mr. Vernon Jones. At that time, he acknowledged that he was Mr. Jones and accepted service of the summons and complaint.

11. Once accepting the documents and after realizing he had been served with a Complaint, I confirmed again that I had properly served papers on Mr. Vernon Jones. It

was only at that time that Mr. Jones began to deny that he was Mr. Vernon Jones, despite his appearance matching the several pictures and videos I had studied of him.

12. Based upon the matching appearance, the location Mr. Jones departed from and his speech, I can with great confidence swear that I served Mr. Vernon Jones with the Complaint and Motion for Preliminary Injunction and brief in the above styled case.

FURTHER DECLARANT SAYETH NAUGHT.

This 12<sup>th</sup> day of January, 2021.

The declarant certifies that this declaration is true and correct upon pain and penalty of perjury. *See*, 20 U.S.C. § 1746.

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*/s/ Doyle Pope*  
Doyle Pope, Declarant